

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

Civil Action No: 4:23-cv-11800-MRG

H.B. BROOKS INTERNATIONAL, INC. d/b/a NETWATCH NORTH AMERICA)
Plaintiff)
v.)
ROYAL SUN FARM LLC,)
ROYALSTON FARM LLC,)
ROYAL SUN CANNABIS LLC, and)
DAMON SCHMIDT)
Defendants)
GFA FEDERAL CREDIT UNION)
Trustee)

PLAINTIFF’S MOTION FOR PRELIMINARY INJUNCTION

Now comes the Plaintiff, H.B. Brooks International, Inc. d/b/a Netwatch North America (“Netwatch”), and, pursuant to Fed. R. Civ. P. 65 respectfully requests the entry of injunctive relief ordering that the Defendant, Royal Sun Farm, LLC (“Royal Sun”), return all of Netwatch’s equipment which Royal Sun is in possession of within ten days of this Court’s Order. A Memorandum in support of this Motion and Proposed Order are attached.

Respectfully Submitted,

/s/ Joseph Perl
Joseph Perl
Attorney for Plaintiff
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Dated: March 18, 2024

7.1 CERTIFICATION

In accordance with Local Rule 7.1(a)(2), the undersigned to this motion did attempt to confer with the Defendants counsel to resolve the issues raised in this motion prior to its filing.

/s/ Joseph Perl
Joseph Perl

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Joseph Perl
Joseph Perl